UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN MILWAUKEE DIVISION

RICHARD G. PRICE,)
Plaintiff,)
vs.) Cause No
NORTHLAND GROUP, INC.,)
Defendant.)

COMPLAINT FOR DAMAGES

Plaintiff, Richard G. Price, by counsel and pursuant to the Federal Rules of Procedure, and for his complaint for damages against Northland Group, Inc. ("Northland"), allege as follows:

Parties

- 1. Plaintiff, Richard G. Price, ("Richard G.") is a citizen of the United States and the State of Wisconsin, and resides in Milwaukee, Wisconsin.
- 2. Defendant, Northland Group, Inc. ("Northland") is a corporation doing business in this District. Northland is a "debt collector" within the meaning of 15 U.S.C. §§ 1692 1692o.

Venue

3. Venue is properly laid in the United States District Court for the Eastern District of Wisconsin.

Jurisdiction

4. Jurisdiction is premised upon 28 U.S.C. § 1331 and 15 U.S.C. § 1692k.(d).

Claim

- 5. Northland has been engaged in harassing, abusive, unconscionable and unfair practices directed at Richard G. in efforts to collect an alleged debt obligation of a Richard **D**. Price.
- 6. Northland has persisted in these efforts on a daily basis within the year preceding this complaint despite written notice of the correct facts, and requests for a reasonable remedy.
 - 7. The foregoing acts are all in violation of 15 U.S.C. § 1692 et seq.

Request for Relief

Richard G. Price requests such damages and other relief as may be available pursuant to 15 U.S.C. § 1962 et seq., or as may be otherwise appropriate.

Respectfully submitted,

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